



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

October 4, 2016

Mr. Johnny Townsend
Water/Wastewater Superintendent
City of Camden
P.O. Box 779
Camden, TN 38320

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
RECEIPT #7196 9008 9111 3808 4766

Re: Pretreatment Semi-Annual Report
Camden Pretreatment Program
NPDES Permit No. TN0064611
Benton County

Dear Mr. Townsend:

The Division of Water Resources acknowledges receipt, on October 21, 2015, of Camden's Pretreatment Semi-Annual Report (SAR) for the April 1, 2015 to September 30, 2015 reporting period. The Division also received Camden's SAR for the October 1, 2015 to March 31, 2016 reporting period on May 16, 2016. Our review of these submittals has generated the following comments:

1. Camden's SAR for the October 1, 2015 to March 31, 2016 was due April 28, 2016. However, the report was not received by this office until May 16, 2016. Please take appropriate actions to ensure that all future SARs are submitted on time.
2. Form No. 1 of both SARs indicates that the mercury detection limit used (0.0002 mg/L) does not show compliance with the protection criteria (PC) of 0.00005 mg/L or the pass through limit (PTL) of 0.00005 mg/L. Form No. 1 of both SARs also indicates that the naphthalene detection limit used (0.005 mg/L) does not show compliance with the PC of 0.001 mg/L. Additionally, Form No. 1 of the SAR received May 16, 2016, indicates that the total phthalate detection limit used (0.18 mg/L) does not show compliance with the PTL of 0.0645 mg/L. The detection limits used should be, at a minimum, low enough to show compliance with the PC and PTLs. Please take the appropriate actions to ensure that all future samples are analyzed using detection limits low enough to show compliance with the PC and PTLs.
3. Camden is currently using an incorrect certification statement on the Cover Sheet of the SARs. Please revise this statement on future reports to include the certification statement found in Tennessee Rule 0400-40-14-.06(1)(b).

We appreciate the cooperation in submitting the required report. If you have any questions, please do not hesitate to contact me at (615) 532-8786 or Laurel.Rognstad@tn.gov.

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'L' followed by a series of loops and a final flourish.

Laurel Rognstad
Environmental Protection Specialist
Compliance and Enforcement Unit

cc: Mr. Ken Lewis– Division of Water Resources, Jackson EFO
Mr. Anthony French – City of Camden